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JAN 31 2007

Docket No. LPTF03  
US App. No. 10/502,269

## REMARKS

**Status of the Application**

Claims 1-10 are pending. Claims 1-10 were rejected under 35 USC 103(a) as being unpatentable over WO 01/39102. Claims 1-10 were rejected under 35 USC 103(a) as being unpatentable over Cheng et al. (US 7,039,759). Claims 1-10 were further rejected under 35 USC 103(a) as being unpatentable over Drabczuk et al. (US 7,011,247).

Applicant has amended claims 1-10 for more clearly define the invention and for correct minor informalities. No new matter adds through the amendments. For the reasons discussed below, withdrawal of the rejections is requested.

**Claim Rejections- 35 U.S.C. 103(a)**

Claims 1-10 were rejected under 35 USC 103(a) as being unpatentable over WO 01/39102.

Applicant respectfully traverses the rejections for reasons discussed below.

Claim 1 as amended reads as:

1. An USB removable memory with replaceable storage medium for optional upgrade and extension of the storage capacity, including an USB connector, a controller and a flash memory, characterized in that: said USB connector and said controller are integrated as a memory body; the flash memory as a physically-independent storage component is replaceably and directly attached to the body, and is electrically connected to the controller for the controller to read from or to write to the flash memory.

WO 01/39102 teaches small-sized portable reader 1 for "smart cards" 7, while the present invention as defined in claim 1 is directed to an USB removable memory. They belong to different fields. The portable reader 1 includes a support body 3 having a slot 5 at one end and an interface 9 at the other end (Fig. 1). A smart card 7 is inserted into slot 5 to be read. But a smart card is not equivalent to a flash memory. Also the connection between slot 5 and smart card 7 is different from that between the memory body and the flash memory of the present invention. Furthermore, as recited in claim 8, the flash memory is contained within the chamber defined between the body and the back cover. While in WO 01/39102 the smart card 7 is not confined in a chamber. Indeed, smart card 7 is bigger than the portable reader 1.

For the reasons discussed above, claims 1-10 are believed patentable over WO 01/39102.

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Claims 1-10 were rejected under 35 USC 103(a) as being unpatentable over Cheng et al. (US 7,039,759).

Cheng teaches a portable data storage device having an USB interface 2, a microcontroller 3, and a flash memory 4. However, Cheng fails to teach or suggest that the flash memory 4 is replaceably attached to the storage device. In Cheng's data storage device, USB interface 2, microcontroller 3, and flash memory 4 are assembled together. The Office Action indicated that the flash memory as the physically-independent storage component is attached to the body (connected to additional USB port 8). Applicant respectfully disagrees. Cheng teaches that USB port 8 permits other USB devices to be coupled to the USB via the device 10, for example, if the user wishes to increase memory space, a USB plug 1 of a second memory device 10 may be connected to the USB port 8. Col. 3, lines 11-16. From the above teachings, it is clear that USB port 8 is for connecting with another memory device 10, not for directly connecting with another flash memory 4. While in the present invention as defined in claim 1, the flash memory is replaceably and directly attached to the body.

For the reasons discussed above, claims 1-10 are believed patentable over Cheng.

Claims 1-10 were further rejected under 35 USC 103(a) as being unpatentable over Drabczuk et al. (US 7,011,247).

Drabczuk teaches a card-like portable article (smart card 3) having a microcontroller 33, which is connected to a connector 5. The connector 5 is not a reader, which cannot read or write a card. Col. 4, lines 1-8. Drabczuk further teaches that the connector 5 possesses no more than a USB connector 51 and a connector 52 for the card 3. Col. 5, lines 4-7. Clearly, the connector 5 are different from the memory body of the present invention, which includes an USB connector and a controller for reading or writing the flash memory. Besides, the smart card 3 is not the same as a flash memory.

For the reasons discussed above, claims 1-10 are believed patentable over Drabczuk.

In addition, it is believed that US 7,039,759 and US 7,011,247 are not qualified prior art of the present application because their effective US filing dates are later than the effective US filing date of the present application.

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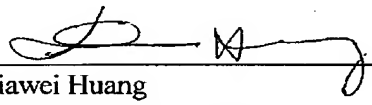
**Conclusion**

In view of the foregoing amendments and remarks, it is respectfully submitted that the remaining claims 1-10 are now in condition for allowance. Allowance of this application is earnestly solicited.

Respectively submitted  
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